

Serial No. 10/527,579  
Art Unit 2625

Docket PD020089  
Customer No. 24498

### REMARKS

Applicants have reviewed this application in light of the Office Action dated September 10, 2009. Claims 15–17, 20–26, 28–29 and 32–35 remain pending in the application. Applicants have amended claims 15–17, 20–23, and have cancelled claims 18 and 19 cancelled without prejudice. Amended claim 15 now incorporates the subject matter of cancelled claims 18 and 19. Lastly, applicants have reintroduced Claim 35 has after its inadvertent omission in the previous amendment.

Claim 15 now recite memories used for storing matrix information, thus reciting a more generalized form of claims 16 and 17. Ample support exists in the specification for such amendments. Claim 15, which now recites the subject matter of claims 18 and 19, also has ample support in the specification. Applicants have amended claims 16 and 17 to reflect the changes in claim 15. Likewise, applicants have amended claims 20–23 to reflect their changed dependencies. Claim 35 now specifies that the limiters lie downstream of the matrix. Support for this amendment exists in the present specification at paragraph 19.

Claims 15–17, 20–26, 28–29, and 33–35 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,337,692 to Rai et al. (hereinafter “Rai”).

Claim 15 as amended recites, *inter alia*, “memories for storing information which the matrix uses to control the color value signals; and a converter for generating a hue signal from the color video signals, the hue signal connected to inputs of the memories.” The Examiner asserts that Rai teaches the converter in its hue ramp. Further, the Examiner further asserts that the hue look-up table (LUT) 1216 shows a connection between a hue signal and the memories.

Applicants note that their claimed memories store information *for the matrix*. The hue LUT and the hue ramp shown in Rai do not communicate in any way with the “t-matrix,” which the Examiner identifies as the claimed matrix. In this regard, applicants direct the examiner’s attention to FIG. 12 of Rai, which shows the hue LUT 1216 and the hue ramp 1222 in communication with the alpha mixer 1230, but not the t-matrix multiplier array 1234. Therefore, no connection exists between the hue signal produced by the hue ramp and the inputs of the memories of Rai.

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Applicants respectfully asserted that Rai fails to disclose or suggest a hue signal connected to the memories which store information for the matrix. For at least this reason, claim 15 patentably distinguishes over the art of record. Claims 16-17, 20-26, 28-29, and 33-35 depend from claim 15 and incorporate by reference all of the features of claim 15, thus rendering these dependent claims allowable as well.

In addition, the dependent claims also include patentable subject matter beyond that recited in the base claim. For example, claims 20 and 21 recite that the converter generates a color saturation signal supplied to multipliers located in the supply lines of the correction values to the matrix. The Examiner asserts that Rai discloses this element in its saturation ramp, and points to a discussion of the alpha mixer to show that the saturation ramp supplies a color saturation signal to multipliers in the matrix's supply lines.

However, as noted above, FIG. 12 clearly shows that the hue ramp only operates in communication with the alpha mixer 1230, which does not in any way affect the operation of the t-matrix 1234. Therefore, applicants maintain that neither the saturation ramp of Rai, nor the output signals therefrom in any way supply multipliers *located in the supply lines* to the matrix. The alpha mixer alters the matrix's *output*, and as such, Rai fails to disclose or suggest a color saturation signal supplied to multipliers located in the supply lines of the correction values to the matrix.

Furthermore, claim 35 as amended recites, "three limiters, connected downstream of the matrix, configured to limit each color signal to a maximum value governed by a quantization." The Examiner asserts that Rai discloses these limiters in its discussion of limiting input signals to geometric constraints. The limiters discussed in Rai affect the *input* signal, and therefore must lie upstream of Rai's matrix. As a result, Rai does not disclose or suggest limiters which are connected downstream of the matrix.

Claim 35 further recites that the limiters of Rai are governed by a quantization. Rai makes no reference to quantization whatsoever. Instead, Rai's limiters are governed by *geometric constraints*. Therefore, Rai fails to disclose or suggest limiters governed by a quantization.

In short, claims 20, 21, and 35 include patentable subject matter separate and apart from that recited in claim 15.

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Reconsideration of the rejection is earnestly solicited.

Claim 32 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Rai in view of U.S. Patent No. 6,433,898 to Bestmann (hereinafter "Bestmann").

Claim 32 depends from claim 15 and therefore includes all of its elements.

Bestmann cannot cure the deficiencies discussed above, as it is not in any way concerned with matrices or the memories used by such matrices. Applicants respectfully assert that Rai and/or Bestmann, taken alone or in combination, fail to disclose or suggest all of the elements of claim 32. Reconsideration of the rejection is earnestly solicited.

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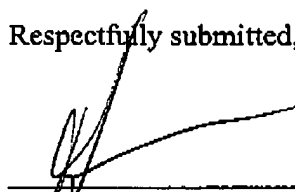
Conclusion

In view of the foregoing, applicants solicit entry of this amendment and allowance of the claims. If the Examiner cannot take such action, the Examiner should contact the applicant's attorney at (609) 734-6820 to arrange a mutually convenient date and time for a telephonic interview.

No fees are believed due with regard to this Amendment. Please charge any fee or credit any overpayment to Deposit Account No. 07-0832.

Respectfully submitted,

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